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July 14, 2023

VIA ECF

Honorable Kenneth M. Karas
United States District Judge
Southern District of New York
300 Quarropas Street, Courtroom 521
White Plains, New York 10601

Re: Finn v. Empress Ambulance Services, Inc. d/b/a Empress EMS, Case No. 7:22-cv-08101-KMK (the "Finn Action")

Dear Judge Karas:

As you know, we represent Empress Ambulance Service, LLC ("Empress") in the above-captioned *Finn* action. Empress writes jointly with Plaintiff John Finn pursuant to the Court's November 14, 2022 Order [ECF No. 17] requiring the parties to the *Finn* Action to submit joint status reports to the public docket providing updates on the progress of settlement negotiations every 14 days. The eighteenth status report is due today, July 14, 2023.

Since the parties' previous status report, Plaintiffs have filed a motion for preliminary approval of settlement in state court and a status conference has been scheduled for August 25, 2023. As previously noted, while the parties both strongly believe that the federal and state courts have concurrent jurisdiction over this matter, Plaintiffs are seeking approval in state court to avoid jurisdictional objections threatened by plaintiffs in later filed actions. We will continue to apprise you of progress and any updates in the state court action.

We respectfully request that the Court continue to stay the later-filed actions during the settlement approval process. In accordance with the Court's November 14, 2022 Order, we will provide another status update on July 28, 2023.

Honorable Kenneth M. Karas

July 14, 2023

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Respectfully submitted,

A handwritten signature in black ink, appearing to read "Casie D. Collignon". The signature is fluid and cursive, with a long, sweeping horizontal stroke at the end.

Casie D. Collignon

cc: All counsel of record (via ECF)